

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

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: PROMESA

: Title III

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: Case No. 17-BK-3283 (LTS)

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: (Jointly Administered)

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FIRST URGENT CONSENTED MOTION FOR EXTENSION OF DEADLINES

To The Honorable United States Magistrate Judge Judith Gail Dein:

The Cuerpo Orgazenido de la Policia, Inc. (hereinafter “COPI”) respectfully submits this urgent consented motion for entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), extending the deadlines set forth in the Order [ECF NO. 8788].

Request for Relief

1. On May 8, 2019, the Cuerpo Organizado de la Policia, Inc. (“Movant”), filed a *Motion of Cuerpo Organizado de la Policia Inc. For Order, Under Bankruptcy Rule 2004, Authorizing Discovery of Title III Debtors Other tan COFINA, Concerning Salaries Owed Pursuant to Pay Scales Granted By Law* [ECF 6871], requesting that the Court: (i) authorize the Movant’s request for production of documents concerning salaries owed for past promotions that have allegedly not been paid by the Puerto Rico Police Department; (ii) authorize the issuance of the document request contained in Exhibit B of the Motion; and (iii) direct the Debtor to meet and confer with Movant regarding the timing of the production.

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On October 2, 2019, the Court entered the Amended Scheduling Order which provides that any opposition to the debtors response to the Motion must be filed by October 18, 2019.
3. The Court entered Order on October 16, 2019 ordering the parties to meet and confer on the Motion and provide the Court with a brief joint status report indicating whether any issues remain under the Rule 2004 request by 4:00pm on October 21, 2019. [ECF 8873].
4. The parties have agreed on having this meeting on October 22, 2019 at 2:00pm. As such, a Joint Motion for Extension of Deadlines will be promptly filed.
5. As such, the Movant needs additional time in order to confer with counsel for debtors and to finalize its analysis of the documents provided by them on October 11, 2019. Accordingly, the Movant, with the Debtor's consent, proposes the following extension of the deadline set forth in the Amended Scheduling Order:
 - i. The deadline to file a reply to the Debtors Motion filed on October 11, 2019 shall be extended to November 1, 2019.
6. Pursuant to Paragraph 1.H of the *Tenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 8027-1], the Movant hereby certifies that it has carefully examined the matter and concluded that there is a true need for an urgent motion; it has not created the urgency through any lack of due diligence; has made a bona fide effort to resolve the matter without a hearing; has made reasonable, good faith communications in an effort to resolve or narrow the issues that are being brought to the Court, and no party opposes the relief requested herein.

Notice

7. Notice of this Motion has been provided to the following entities, or their counsel, if known: (i) the U.S. Trustee; (ii) the Office of the United State Attorney for the District of Puerto Rico; (iii) the Oversight Board; (iv) AAFAF; (v) the official committee of retirees; (vi) the insurers of the bonds issued or guaranteed by the Debtors; (vii) counsel to certain ad

hoc groups of holders of bonds issued or guaranteed by the Debtors; (viii) the Puerto Rico Department of Justice, counsel for debtors; and (ix) all parties that have filed a notice of appearance in the above-captioned Title III cases.

8. The Movant submits that, in light of the nature of the relief requested, no other or further notice needs to be given.

WHEREFORE, the Movant respectfully requests that the Court enter the Proposed Order and grant such other relief as is just and proper.

Dated: October 18, 2019.
San Juan, Puerto Rico

/s/ Lirio Del Mar Torres

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Inc*

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

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**ORDER GRANTING FIRST URGENT CONSENTED MOTION FOR EXTENSION OF
DEADLINES**

Upon the *First Urgent Consented Motion for Extension of Deadlines* and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Extension Motion is in the best interests of the Debtor and Movant; and the Court having found that the Movant provided adequate and appropriate notice of the Extension Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Extension Motion; and the Court having determined that the factual bases set forth in the Extension Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. The Extension Motion is granted as set forth herein.
2. The deadline for Movant to file a reply to any oppositions shall be extended to November 1, 2019.

Dated: _____, 2019

HON. JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE